

# EXHIBIT 15

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF  
GERALD MARK KNOBLACH  
San Francisco, California  
Monday, July 16, 2018  
Volume 3

Reported by:  
RACHEL FERRIER, CSR No. 6948  
Job No. 2966005  
PAGES 472 - 688

1 Avanti's communications recovery proposal in connection 04:46:00  
2 with the hurricane recovery in Puerto Rico. 04:46:09  
3 A Yes. This appears to be, as its title states, 04:46:12  
4 "Maria PR1," which I assume refers to "Puerto Rico 1," 04:47:40  
5 "Communications Recovery Plan September 2017." 04:47:44  
6 Q And you were looking to get paid for providing 04:47:47  
7 the services that you were going to provide; correct? 04:47:52  
8 A We are a small company. We were looking to get 04:47:54  
9 covered our costs of deploying and logistically 04:47:58  
10 supporting our people there. 04:48:00  
11 Q Just to cover your costs? 04:48:01  
12 A Yes. I think that that was our goal in this, 04:48:03  
13 just to cover our costs. We didn't want to make profit 04:48:06  
14 on other people's adversity, and, you know, the -- the 04:48:08  
15 benefit for us would have been the public relations and 04:48:14  
16 the goodwill of providing this type of coverage, as long 04:48:17  
17 as our costs were covered. 04:48:21  
18 Q In your -- Avanti's proposal was not accepted? 04:48:22  
19 A My understanding is we came in second place. 04:48:29  
20 Q And what do you mean by that? 04:48:31  
21 A I got a text from Jose, the CEO of Avanti, who 04:48:35  
22 said we came in second place to Google Loon, and my 04:48:39  
23 understanding is that Google Loon offered to do the 04:48:43  
24 service for free, and it's difficult to compete with 04:48:45  
25 free when, you know, you have got costs, and you are a 04:48:48

1 small company. You don't have the in-depth pockets of a 04:48:53  
2 Google to give our service away for nothing. Although, 04:48:56  
3 in events like this, where, obviously, people's lives 04:49:02  
4 are impacted, we wish we could. 04:49:05

5 Q And so your testimony is you received a text 04:49:08  
6 message from Jose saying that you had come in second to 04:49:11  
7 Google? 04:49:14

8 A Mm-hmm. 04:49:14

9 Q Okay. I'm not sure I've seen that text message. 04:49:15  
10 Has that been produced in this case? 04:49:20

11 A I believe we produced a number of text messages, 04:49:21  
12 and, you know, it may not be explicit in the text 04:49:25  
13 message. I think the text message says we came in 04:49:30  
14 second, and then there was quickly a press announcement 04:49:32  
15 that Google Loon was going to provide high-altitude 04:49:33  
16 support for communications in their recovery plan for 04:49:38  
17 Puerto Rico, for Maria. So, obviously, they came in 04:49:39  
18 first. 04:49:42

19 (Exhibit 1286 was marked for 04:49:42  
20 identification by the Court Reporter.) 04:49:42

21 BY MR. WERDEGAR: 04:49:42

22 Q Let me show you Exhibit 1286. 04:49:43  
23 Are these the text messages with Jose Negron that 04:50:04  
24 you were referring to, Mr. Knoblach? 04:50:08

25 A I want to review them. 04:50:09

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before  
4 me at the time and place herein set forth; that any  
5 witnesses in the foregoing proceedings, prior to  
6 testifying, were placed under oath; that a verbatim  
7 record of the proceedings was made by me using machine  
8 shorthand which was thereafter transcribed under my  
9 direction; further, that the foregoing is an accurate  
10 transcription thereof.

11 I further certify that I am neither financially  
12 interested in the action nor a relative or employee of  
13 any attorney or any of the parties.

14 IN WITNESS WHEREOF, I have this date subscribed  
15 my name.

16  
17 Dated: July 23, 2018

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24 RACHEL FERRIER

25 CSR No. 6948